## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA BEAUFORT DIVISION

Ronald Williams,	)
Plaintiff,	)
v.	) C.A. No: 9:16-cv-03097-DCN
Wal-Mart Stores, Inc., Wal-Mart Stores East, LP, and Wal-Mart Stores East, Inc.,	) ) )
Defendants.	)

## Defendants' Request for Protection

In accordance with Local Rule 6.02, Defendants Wal-Mart Stores, Inc., Wal-Mart Stores East, LP, and Wal-Mart Stores East, Inc. (collectively "Wal-Mart") respectfully file this request for protection from trial during the March 2018 trial term, from March 1, 2018 through March 31, 2018.

Wal-Mart's lead counsel, Neal Manne, will be in Ireland from March 9, 2018 through March 18, 2018 on a long-scheduled trip to celebrate his wife's 60<sup>th</sup> birthday. He is therefore unable to prepare for or participate in a trial that begins during the March 2018 trial term.

Wal-Mart previously provided notice of this conflict to plaintiff's counsel.

Dated: August 17, 2017

By: /s/ Ronald K. Wray, II
Ronald K. Wray, II (Fed I.D. 05763)
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Attorneys for Defendants Wal-Mart Stores, Inc., Wal-Mart Stores East, LP, and Wal-Mart Stores East, Inc.

## **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing instrument has been served on the following counsel of record, this 17th day of August, 2017, as indicated below:

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> /s/ Ronald K. Wray, II Ronald K. Wray, II